

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

KOCH FOODS OF ALABAMA LLC,

Plaintiff,

v.

GENERAL ELECTRIC CAPITAL
CORPORATION,

Defendant.

2007 JUN 13 A 11:45

CIVIL ACTION NUMBER:

2:07cv522-MHT

MOTION FOR ADMISSION *PRO HAC VICE*

COMES NOW the undersigned, pursuant to Local Rule 83.1(b), and respectfully moves this Court for admission *pro hac vice* of Alexander Terras and Timothy Scott Harris in the above-styled cause. As grounds for this motion, the undersigned shows as follows:

1. Alexander Terras and Timothy Scott Harris have been retained by Defendant General Electric Capital Corporation to represent it in connection with this action.

2. Mr. Terras and Mr. Harris are attorneys at the firm of Reed Smith Sachnoff & Weaver, 10 South Wacker Drive, Chicago, Illinois, 60606, (312) 207-1000 (telephone), (312) 207-6400 (facsimile), aterras@reedsmith.com, and tharris@reedsmith.com.

3. Mr. Terras and Mr. Harris are qualified, admitted, and licensed to practice before the United States District Court for the Northern District of Illinois. Attached hereto are the Certificates of Good Standing for Mr. Terras and Mr. Harris issued by that Court. Mr. Terras

and Mr. Harris have never been disciplined or otherwise disqualified from the practice of law nor has an application for their *pro hac vice* admission in a case been denied.

WHEREFORE, PREMISES CONSIDERED, the undersigned respectfully requests that Mr. Terras and Mr. Harris be admitted to practice *pro hac vice* before this Court.

Respectfully submitted,

Rusha C. Smith

Rusha C. Smith

Attorney for Defendant General Electric Capital Corporation

OF COUNSEL

Bradley Arant Rose & White LLP
One Federal Place
1819 Fifth Avenue North
Birmingham, AL 35203-2104
Telephone: (205) 521-8000
Facsimile: (205) 521-8800

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading has been served upon counsel of record addressed as follows:

Thomas G. Mancuso, Esq.
Mancuso & Franco, P.C.
7515 Halcyon Summit Drive
Suite 301
Montgomery, AL 36117

Eugene J. Geekie, Jr., Esq.
Mike Xu, Esq.
Schiff Hardin LLP
6600 Sears Tower
Chicago, IL 60606

by placing same in the United States mail, postage prepaid, on this the 13th day of June, 2007.

Rusha C. Smith
OF COUNSEL

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Alexander Terras

Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Alexander Terras
was duly admitted to practice in said Court on (07/26/1978)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (06/11/2007)

Michael W. Dobbins, Clerk,

By: Krysten J. Coppeletta
Deputy Clerk

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Timothy Scott Harris

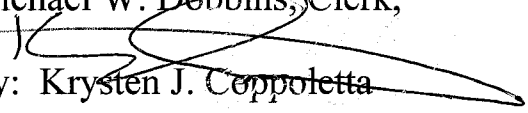
Northern District of Illinois

I, Michael W. Dobbins, Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Timothy Scott Harris
was duly admitted to practice in said Court on (01/11/1989)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (06/11/2007)

Michael W. Dobbins, Clerk,

By: 
Deputy Clerk